

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

WESTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	
v.	)	Case No. 3:12-cr-50027
	)	Judge Philip G. Reinhard
RITA A. CRUNDWELL,	)	
	)	
Defendant.	)	
	)	
PERCOTT COMPANY, LLC,	)	
IDAL REALTY, LLC, by BRUCE LANS	)	
	)	
Petitioner	)	

**STIPULATION FOR DISMISSAL OF PETITIONER'S ANCILLARY CLAIM**

WHEREAS, Petitioner Percott Company, LLC, and Idal Realty, LLC, by and through representative Bruce Lans, (hereafter Petitioner) filed a claim to forfeited property (Dkt. 239), specifically, monies used to repair a Cub Cadet Lawn Mower Model 53BB5BBP750, serial number 3F066Z82042;

WHEREAS, As the parties agree that the value of the lawn mower is approximately the cost of the repairs plus \$500.00, the United States and Petitioner have agreed on July 22, 2015, to settle this claim by transferring ownership of the above-referenced lawn mower from the United States to Petitioner in exchange for \$500.00 payable to the United States of America;

WHEREAS, Under the settlement Petitioner releases all claims to forfeited property, including the claim filed before this Court (Dkt. 239);

NOW THEREFORE, PETITIONER AND THE UNITED STATES HEREBY  
STIPULATE to dismiss the above-captioned matter with prejudice. This stipulation and  
dismissal completely terminates the Petitioner's claim in the above-titled action.

The parties hereto also request that this Court retain jurisdiction to enforce the terms and  
conditions of the settlement and release.

Respectfully submitted,

M. Kendall Day, Chief  
Asset Forfeiture and Money Laundering Section

Percott Company, LLC  
Idal Realty, LLC

By:                                 /s/                                  
Julia E. Jarrett, Trial Attorney  
Asset Forfeiture and Money Laundering Section  
U.S. Department of Justice, Criminal Division  
1400 New York Ave NW  
Washington, D.C. 20053  
202-514-5131  
julia.jarrett@usdoj.gov

By:                                 /s/                                  
Bruce Lans, Petitioner  
Post Office Box 211  
South Beloit, Illinois 61080  
merijranch@gmail.com

**Certificate of Service**

I hereby certify that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the attorneys of record for the defendant.

I also certify that on this date, I mailed the foregoing to Petitioner at:

Bruce Lans  
Post Office Box 211  
South Beloit, Illinois 61080  
Email: merijranch@gmail.com  
*Pro Se Petitioner*

/s/ Julia E. Jarrett

Julia E. Jarrett  
Trial Attorney

Dated: August 14, 2015

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

WESTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	
v.	)	Case No. 3:12-cr-50027
	)	Judge Philip G. Reinhard
RITA A. CRUNDWELL,	)	
	)	
Defendant.	)	
	)	
PERCOTT COMPANY, LLC,	)	
IDAL REALTY, LLC by BRUCE LANS,	)	
	)	
Petitioner	)	

**ORDER**

Based on the stipulation of the parties, and good cause appearing therefor,

The release by Petitioner of all claims and potential claims he has or may have against  
forfeited property in the above-titled action is hereby APPROVED; and

IT IS ORDERED that this claim be, and hereby is, DISMISSED WITH PREJUDICE.

---

PHILIP G. REINHARD  
United States District Judge

DATED: \_\_\_\_\_